

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:22 CR 165 RLW JMB
	)	
ALLEN L. ROBINSON,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Donald S. Boyce, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with possession of a firearm while under an order of protection in violation of 18 U.S.C. §922(g)(8), an offense for which a maximum 10-year imprisonment is prescribed under Title 18.

2. According to the St. Louis Metropolitan Police Department Report # 22-011334, on March 19, 2022, at approximately 3:00 am, SLPMD officers responded to a call for shots fired in downtown St. Louis. Officers received a description of the shooter and encountered a man matching the description – Allen L. Robinson - on the sidewalk nearby. As a police car drove toward Robinson, he stepped out into the street in front of the police car and pointed a gun at the

officers inside. The driver of the police car drove forward to get away from the threat and then turned around to face the car toward Robinson. Robinson then ran, and the police caught him. A search revealed a loaded Taurus 9mm pistol in the Defendant's waistband. Robinson is subject to an order of protection issued by the court in Jefferson County, MO and which prohibits Robinson from harassing, stalking, or threatening an intimate partner and finds that Robinson represents a credible threat to the physical safety of the intimate partner.

3. Based on the statutory factors in 18 U.S.C. § 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with a firearm offense, in which the Defendant pointed a loaded gun at uniformed police officers in a marked car and attempted to flee from police. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant is strong. Pursuant to Section 3142(g)(3), the history and characteristics of the Defendant include the prior finding that he represents a credible threat to the physical safety of another person.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Donald S. Boyce  
DONALD S. BOYCE, #6282562IL  
Assistant United States Attorney